REMARKS

This is in response to the Office Action mailed April 19, 2007.

Claims 1 through 7 are currently pending in the application.

Claims 1 through 7 stand rejected.

Applicant has amended claims 1, 3, 4, 6, and 7, and respectfully request reconsideration of the application as amended herein.

35 U.S.C. § 103(a) Obviousness Rejections

Obviousness Rejection Based on U.S. Patent No. 5,909,633 to Haji et al.

Claims 1, 3, 4 and 6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Haji et al. (U.S. Patent No. 5,909,633). Applicant respectfully traverses this rejection, as hereinafter set forth.

M.P.E.P. 706.02(j) sets forth the standard for a Section 103(a) rejection:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (Emphasis added).

After carefully considering the cited prior art, the rejection, and the Examiner's comments, Applicant has amended the claimed inventions of presently amended independent claims 1, 3, 4, and 6 to clearly distinguish over the cited prior art.

Turning to the cited prior art, the Haji et al. reference teaches or suggests Nickel films formed on copper pads on a substrate having gold alvers further formed on the nickel films. A nickel oxide film formed on the surface of the gold layer is removed by plasma etching.

Applicant asserts that the Haji et al. reference does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1, 3, 4, and 6 because the Haji et al. reference does not teach or

suggest all the claim limitations of the presently claimed inventions. Applicant asserts that the Haji et al. reference does not teach or suggest the claim limitations of the claimed inventions of presently amended independent claims 1, 3, 4, and 6 calling for "consuming a portion of the at least one layer of metal during the connecting of one end of a conductive lead of a TAB tape for connecting at least a portion of one end of the conductive lead of the TAB tape to at least a portion of the layer of copper". Applicant asserts that the Haji et al. reference does not teach or suggest any such claim limitation. Applicant further asserts that one of ordinary skill in the art using "common sense" would not infer any such claim limitation from the Haji et al. reference based upon the removal of a nickel oxide film through the use of plasma etching.

Therefore, presently amended independent claims 1, 3, 4, and 6 are allowable.

Obviousness Rejection Based on U.S. Patent No. 5,909,633 to Haji et al. in view of U.S. Patent No. 5,848,467 to Khandros et al.

Claims 2, 5 and 7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Haji et al. (U.S. Patent No. 5,909,633) in view of Khandros et al.(U.S. Patent No. 5,848,467).

Applicant respectfully traverses this rejection, as hereinafter set forth.

Applicant asserts that any combination of the Haji et al. reference in view of the Khandros et al. reference does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1, 4, and 7 under 35 U.S.C. § 103 because any combination of the Haji et al. reference in view of the Khandros et al. reference does not teach or suggest all the claim limitations of the claimed inventions. Applicant asserts that there is no teaching or suggestion whatsoever in either the Haji et al. reference, the Khandros et al. reference, or any combination of the Haji et al. reference in view of the Khandros et al. reference for the claim limitation of independent claims 1, 4, and 7 calling for for "consuming a portion of the at least one layer of metal during the connecting of one end of a conductive lead of a TAB tape for connecting at least a portion of one end of the conductive lead of the TAB tape to at least a portion of the layer of copper". Therefore, presently amended independent claims 1, 4 and 7 are allowable as well as dependent claims 2 and 5.

ENTRY OF AMENDMENTS

The amendments to claims 1, 3, 4, 6, and 7 above should be entered by the Examiner because the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application to comply with the provisions of 35 U.S.C. § 132. Further, the amendments do not raise new issues or require a further search.

CONCLUSION

Claims 1 through 7 are believed to be in condition for allowance, and an early notice thereof is respectfully solicited. Should the Examiner determine that additional issues remain which might be resolved by a telephone conference, he is respectfully invited to contact Applicant's undersigned attorney.

Respectfully submitted,

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